

REMARKS

Claims 1-18 are currently pending in the patent application.

The Examiner has rejected Claims 13-18 under 35 USC 112 as not supported by the Specification. Applicants respectfully assert that the original Claims 13 and 14 described the program storage device for implementing the inventive method. One having skill in the relevant art would have understand that the inventors were in possession of the claimed invention at the time of application filing and would fully understand how to implement the program storage device from the description. Applicants are not claiming all program storage devices, for those clearly have been in the prior art and are well understood in the art; rather, Applicants are claiming a program storage device with the specific program instructions to implement the disclosed method. To implement the invention on a program storage device would be well within the purview of one having ordinary skill in the art upon a reading of the present Specification, including the original claims.

By the previous amendment, Applicants amended the Specification to include a description of the program

storage device, which finds support in the original Claims 13-14. Applicants reiterate that the language of the original claims 13 and 14 was sufficient to reasonably convey to one skilled in the relevant art that the inventors had possession of the claimed invention at the time the application was filed, in accordance with 35 USC 112, first paragraph. Applicants request reconsideration of the rejection of the claims directed to the program storage device for storing a program of instructions executable by a computer for implementing the inventive method.

The Examiner has rejected Claims 1-18 under 35 USC 102(e) as anticipated by Sinai. For the reasons set forth below, Applicants respectfully assert that all of the pending claims are definite and patentable over the cited prior art.

The present application teaches and claims a system for a user interacting with a web site to automatically create a voice XML file. The system includes a graphic user interface for defining a multiple of icons, wherein each of the icons corresponds to one or more attributes of voice XML; a voice XML tag generator for interpreting the action stream of a user based on a library of voice XML tags and generating the corresponding voice XML tags; and a

voice XML file generator 103 for combining the contents to be played with the tags generated by the voice XML tag generator according to voice XML syntax for creating the voice XML file. Under the present invention, the user is dynamically creating a voice file to interact with a web site. Based on user input, the icons are invoked, with the hyperlink addresses, and the user edited stream is interpreted using voice XML tags to generate a voice XML file.

The Examiner has, in the **Response to Arguments** section of the Final Office Action, stated that Sinai discloses a method of generating a VXML file including a step of selecting icons to create a dialog flow. The Examiner has concluded that the Sinai selection of icons is considered equivalent to the step of creating a voice file. Applicants respectfully disagree that Sinai teaches the invention as claimed in the amended claims, as further detailed below.

The Examiner has further stated that "Applicant is advised to amend the claims to include steps presented in figures 7" (sic). Applicants appreciate the Examiner's assistance and advice with regard to the method steps detailed in Fig. 7. The process flow illustrated in Fig. 7 includes user editing of TTS text in the GUI. Applicants

respectfully note that Claims 3, 4, 9, 10, 15 and 16 do recite the user editing of TTS as illustrated in Fig. 7. Applicants further note that Figure 8 illustrates a process flow which includes user editing of a real-time recorded audio stream in the GUI. For both the embodiments of Fig. 7 and Fig. 8, the system responds to the user input by interpreting the recorded user action stream with hyperlinks, generating voice XML tags on the basis of the voice XML library and generating the voice XML file by combining the generated tags and the stream according to the voice XML syntax. Applicants amend the language of the independent claims herein to more explicitly recite the user editing of GUI content.

The Sinai patent is directed to a developer creating a file that a user can access on a web page in order to "interact" with the web page. The developer graphically defines a dialog as a sequence of speech objects in order to "pre-record" voice files that can be played to a user. While the Sinai system may be accessed by a user, there is nothing in Sinai which teaches or suggests that the web site user can dynamically create a voice file to interact with the web site. Sinai simply lets the user select icons to playback prestored dialogs created by the developer.

In contrast, the present invention allows the user to dynamically create voice XML files by providing a graphic user interface for defining a plurality of icons, each of the icons corresponding to one or more attributes of voice XML; receiving user selection input of the icons whereby the user edits the text in the graphic user interface (GUI) such that the text is marked where hyperlinks are to be added. The an action stream of a user is then recorded by invoking the icons in the graphic user interface using the addresses of the hyperlinks, followed by the system interpreting the recorded user action stream based on a library of voice XML tags to create the voice XML file (Claims 1, 7 and 13).

Applicants respectfully contend that Sinai is not teaching or suggesting such a graphical user interface component or functionality as claimed. Further, there is nothing in the Sinai patent which teaches or suggests the steps and means for automatically adding one or more audio hyperlinks for a voice file (Claims 2-6, 8-12 and 14-18).

For a patent to anticipate another invention under 35 USC § 102(e), the patent must clearly teach each and every claimed feature of the anticipated invention. Since the Sinai patent clearly does not teach the features of the system, method or program storage device as claimed, namely

the steps and means for providing a graphic user interface for defining a plurality of icons; receiving user selection input of the icons to edit GUI-displayed content; recording an action stream of a user invoking the icons in the graphic user interface; and interpreting the action stream to dynamically create a user voice XML file, it cannot be maintained that the Sinai patent anticipates each and every claim feature of the independent claims, Claims 1, 7 and 13, or of the remaining claims which depend therefrom and add further limitations thereto.

Based on the foregoing amendments and remarks, Applicants respectfully request entry of the amendments, reconsideration and withdrawal of the 112 rejections, reconsideration and withdrawal of the 102 rejections based on Sinai, and issuance of the claims.

Respectfully submitted,

J. T. C. Yeh, et al

By: /Anne Vachon Dougherty/
Anne Vachon Dougherty
Registration No. 30,374
Tel. (914) 962-5910